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10 Attorneys for Defendant
11 UNITED NATIONAL INSURANCE COMPANY

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO/OAKLAND DIVISION

15 SCOTTSDALE INSURANCE
16 COMPANY, an Ohio Corporation

17 Plaintiff,

18 v.

19 UNITED NATIONAL INSURANCE
20 COMPANY and DOES 1 through 15.

21 Defendants.

Action No.: C08-03981CW

STIPULATION TO EXTEND DEADLINES
FOR EXPERT DISCLOSURE AND TO
COMPLETE MEDIATION; ORDER.

[Local Rules 6-2 and 7-12]

22 Pursuant to Local Rules 6-2 and 7-12, defendant United National Insurance Company
23 and plaintiff Scottsdale Insurance Company, through the signatures of their respective
24 counsel below, stipulate to continue the deadline for disclosure of expert-witness
25 information from May 30, 2009, to June 30, 2009, and to continue the deadline to
26 complete mediation from June 4, 2009, to July 3, 2009.

27 The parties' request the continuances because they believe that a decision on the
28 pending cross-motions for summary judgment or partial summary judgment, as to which

1 the Court heard oral argument on April 30, 2009, will likely obviate the need for expert
 2 disclosure or mediation in this matter, so that continuing both of the relevant dates will
 3 likely preclude the unnecessary expenditure of the Court's, the mediator's, and the
 4 parties' resources.

5 Additionally, at the April 30 hearing, the Court ordered the parties to contact counsel
 6 in the underlying *Williams v. Miller* action to determine whether a global settlement of
 7 this action, the *Williams* action, and the related underlying workers' compensation
 8 proceeding might be obtained by way of the judicial mediation in this action. The
 9 mediator, Anne M. Lawlor Goyette, has subsequently conducted two conference calls,
 10 and has scheduled a third conference call for June 2, 2009, with all counsel. The
 11 undersigned expect the mediator to schedule mediation during the upcoming conference
 12 call, because the May 28, 2009, deadline to file a writ petition in the workers'
 13 compensation matter, which might affect the positions of some of the underlying parties,
 14 will have passed.

15 The dates have been previously continued only once before, and the parties do not
 16 believe their further continuance will affect any other deadline in this matter.

17 Respectfully submitted,

18 NIELSEN, HALEY & ABBOTT LLP

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 20
 21 May 26, 2009

By: _____
 Thomas H. Nienow
 Attorneys for Defendant
 UNITED NATIONAL INSURANCE COMPANY

22
 23
 24 LOW, BALL & LYNCH

25
 26
 27 May ____, 2009

By: _____
 David L. Blinn
 Attorneys for Plaintiff

SCOTTSDALE INSURANCE COMPANY

PURSUANT TO STIPULATION, IT IS SO ORDERED.



June 8, 2009

Honorable Claudia Wilken
UNITED STATES DISTRICT JUDGE

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